

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.

Plaintiff

v.

WORLD AVENUE USA, LLC
successor by merger to NIUTECH, LLC.,
DBA "THE USEFUL," ET AL.

Defendants

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Case No. PJM 08 cv 0921

PLAINTIFF'S CONSENT MOTION
FOR EXTENSION OF TIME

Plaintiff moves for an extension of time for the filing of its reply to Defendant's opposition at ECF No. 485 to Plaintiff's motion to reconsider at ECF No. 449. The due date for the filing of the reply is November 18, 2010.

Counsel have conferred by telephone and Defendant has agreed to the extension sought. Specifically, Stephen H. Ring, Esquire for Plaintiff, and Sanford Saunders, Esquire for Defendant World Avenue USA, LLC conferred by telephone on November 18, 2010. During that telephone conversation Mr. Saunders consented to Plaintiff's request for an extension of time to December 10, 2010 for the filing of the reply memorandum. That consent was further confirmed via email from Mr. Saunders stating, "Steve: Thank you for the word version.

We will consent to the extension you requested on the item identified as: By 11/18, reply to: file Reply to deft opp at DE 485 to Pl mo reconsider deft's mo compel re Ints set 3 (see DE 449, 444, 276.)"

The primary reason for the extension is to allow time for preparation for a meeting between counsel on November 19, 2010 to explore resolution of this case. Counsel have also agreed to discuss mutual extensions for certain other filings and responses that fall due during the next two weeks, unrelated to the matters set for hearing on November 29, 2010.

Wherefore, Plaintiff moves for an order granting extension to December 10, 2010 for the filing of Plaintiff's reply memorandum in support of its motion at ECF No. 449.

_____/s/
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_____/s/
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Attorneys for Plaintiff

Certificate of Service

I certify that a copy of the foregoing documents was served on the date of ECF filing, via the ECF system, on all counsel of record.

_____/s/
Stephen H. Ring